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June 29, 2022

Hon. Ann Marie Donio  
United States Magistrate Judge  
for the District of New Jersey  
United States District Courthouse  
4th & Cooper Streets  
Camden, New Jersey 08101

By ECF & First Class Mail (Courtesy Copy)

Re: Estate of Gordon, et al v Wetzel, et al., 1:21-cv-04861 (NLH)  
(AMD)

Dear Judge Donio,

I write to report the status of discovery with respect to the State defendants. Please note that where I refer to defendants, I am specifically speaking of defendants Grewal and Callahan only.

At this point, we have given up on coaxing and importuning defendants to meet their obligations (and we believe our efforts have been substantial) as pointless.

The history of our efforts has been confounding. When we were first able to engage defendants is a dialogue back in March, it appeared that reasonable resolutions and deadlines were agreed to. Indeed, that seemed to be the outcome of subsequent discussions as well. While each subsequent conversation with defendants appears to have yielded agreement (see, e.g. Exhibits A and B), without meaningful exception, none of the promises or resolutions were reified.<sup>1</sup>

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<sup>1</sup>After the Grand Jury acted, we did receive the material defendants had been withholding on grand jury grounds - but only that material - and its production was not among the resolutions we had cooperatively reached.

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As you know, we have a status conference before you currently set for July 13<sup>th</sup>. We believe that bringing this matter before you now by this letter will induce the defendants to meet their long-disregarded commitments and work to responsibly meet their disclosure obligations to avoid having to justify their failure to do so at a conference before you. Should it not, upon your leave we will be prepared to address that at the conference.

With respect to the conference, I am in depositions all day on Wednesday and Thursday of that week and the week following. For that reason, I am respectfully requesting that it be re-scheduled to another time convenient to the Court and parties.

As always, thank you for your courtesies and kind attention.

Respectfully,

/s/Neal Wiesner

Neal Wiesner

cc: All counsel of record (via CM/ECF)